Service of the within and receipt of a copy thereof is hereby admitted this.....day of August, A.D. 1972.

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IN THE

Supreme Court of the United States

October Term, 1972
No. 72-302

PICTURE MUSIC, INC.,

Petitioner,

vs.

SORREN, INC.,

Respondent.

MOTION FOR PERMISSION TO FILE AND BRIEF OF COMPOSERS AND LYRICISTS GUILD OF AMERICA, INC. AND SCREEN COMPOSERS OF THE UNITED STATES OF AMERICA, AMICI CURIAE.

THEODORE W. KHEEL,
ABRAHAM MARCUS,
LEONARD ZISSU,
Attorneys for Composers and Lyricists Guild of America, Inc., and Screen Composers Association of the United States of America, Amici Curiae.

BATTLE, FOWLER, STOKES & KHEEL,
280 Park Avenue,
New York, New York 10017,

ZISSU, MARCUS, STEIN & COUTURE,
270 Madison Avenue,
New York, New York 10016,
Of Counsel.

Supreme Court, U.S.
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IN THE

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October Term, 1972
No. 72-302

PICTURE MUSIC, INC.,

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vs.

BOURNE, INC.,

Respondent.

MOTION FOR PERMISSION TO FILE AND BRIEF OF COMPOSERS AND LYRICISTS GUILD OF AMERICA, INC. AND SCREEN COMPOSERS OF THE UNITED STATES OF AMERICA, AMICI CURIAE.

Pursuant to Rules of this Court, Composers and Lyricists Guild of America, Inc. (CLGA) and Screen Composers Association of the United States of America (SCA) respectfully move the Court to grant them permission to file a brief amici curiae herein on the following grounds:

1. The petitioner, Picture Music, Inc., has granted its permission to CLGA and SCA to file a brief amici curiae in support of petitioner's application for *writ of certiorari.*

2. CLGA is a corporation and SCA an unincorporated association which include in their combined memberships the composers of music and writers of lyrics for motion pictures for theat-

rical exhibition and television broadcast, almost without exception.

The memberships of CLGA and SCA are vitally concerned with the question of whether independent contractor authors are to be equated, for purposes of renewal copyright, with the employee author.

Respectfully submitted this 7th day of September, 1972.

THEODORE W. KHEEL,
ABRAHAM MARCUS,
LEONARD ZISSU,
Attorneys for Composers and Lyricists Guild of America, Inc. and Screen Composers Association of the United States of America, Amici Curiae.

BATTLE, FOWLER, STOKES & KHEEL,
280 Park Avenue,
New York, New York 10017,

ZISSU, MARCUS, STEIN & COUTURE,
270 Madison Avenue,
New York, New York 10016,
Of Counsel

BRIEF AMICI CURIAE OF THE COMPOSERS AND LYRICISTS GUILD OF AMERICA, INC., AND OF SCREEN COMPOSERS ASSOCIATION OF THE UNITED STATES OF AMERICA.

Interest of Amici Curiae.

The Screen Composers Association of the United States of America (SCA) was organized in about 1945 as an unincorporated voluntary membership association of composers who create background music under special assignment for filmed and taped television programs and motion picture productions.

The Composers and Lyricists Guild of America, Inc., was formed in about 1953 and is a non-profit membership corporation, the members of which are the writers of background music and of song music under special assignment for filmed and taped television programs and motion picture productions.

The membership of the two organizations include, almost without exception, all the creative writers of music and lyrics for motion pictures and television motion pictures.

I.

Amici Curiae Pray That This Court Grant the Writ of Certiorari for Which Picture Music, Inc., Has Filed Its Petition.

The Composers and Lyricists Guild of America, Inc., and the Screen Composers Association of the United States of America adopt as their own the petition and

brief submitted by Picture Music, Inc., and endorse the reasons therein given for the granting of the petition.

Respectfully submitted,

THEODORE W. KHEEL,
ABRAHAM MARCUS,
LEONARD ZISSU,
Attorneys for Composers and Lyricists Guild of America, Inc., and Screen Composers Association of the United States of America, Amici Curiae.

BATTLE, FOWLER, STOKES & KHEEL,
280 Park Avenue,
New York, New York 10017,

ZISSU, MARCUS, STEIN & COUTURE,
270 Madison Avenue,
New York, New York 10016,
Of Counsel.